

## **REMARKS**

Applicant expresses appreciation to the Examiner for consideration of the subject patent application. This amendment is in response to the Office Action mailed February 7, 2008. All pending claims were rejected on the merits. Claims 1-25 were originally presented and remain in the application. By this amendment, claims 1, 2, 7, 8, 14, 18, 19-21, 23, and 25 have been amended. No claims have been added or canceled.

### **Amendments to the Claims**

In response to the Examiner's rejections, all of the pending independent claims have been amended to more clearly set forth and to emphasize for reconsideration recitations considered by Applicants to patentably distinguish over the references of record.

In this manner, independent method Claims 1 and 7 as amended and presented herein succinctly, but not newly, recite the submission of an identified digital file "without intervening transformation directly to a predetermined halftone process". Similarly, independent system Claims 14 and 19 as amended and presented herein succinctly, but not newly, recite a memory device containing a series of computer-executable steps that cause an associated processor to submit an identified digital file "without intervening transformation directly to a predetermined halftone process". Finally, independent system Claim 23 as amended and presented herein succinctly, but not newly, recites a plurality of printers configured to submit an identified digital file "without intervening transformation directly to a predetermined halftone process".

The balance of the pending claims depend directly or indirectly from one or another of the pending independent claims as amended and presented herein, and accordingly also incorporate the recitations quoted in the paragraph immediately above.

These amendments to independent Claims 1, 7, 14, 19, and 23 do not add new matter, and entry thereof is respectfully requested.

In addition, selected of the pending independent claims have also been amended to reintroduce for reconsideration recitations considered by Applicants to patentably distinguish over the references of record. These recitations were previously presented in this prosecution, but were not part of the claims evaluated in the outstanding Office Action.

In this manner, independent method Claim 7 as amended and presented herein again recites both a digital halftone file that is “defined by a plurality of discrete digital values”, and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”. Claims 8-13 depend directly or indirectly from independent Claim 7 as amended and presented herein, and accordingly also incorporate the recitations quoted in the sentence immediately above.

Similarly, independent system Claim 19 as amended and presented herein again recites a memory device containing a series of computer-executable steps that cause an associated processor to both generate a digital halftone file that is “defined by a plurality of discrete digital values”, and to submit the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”. Claims 20-22 depend directly from independent Claim 19 as thusly amended and presented herein, and accordingly also incorporate the recitations quoted in the sentence immediately above.

These amendments to independent Claims 7 and 19 do not add new matter, and entry thereof is respectfully requested.

Dependent Claim 2 newly recites the step of “printing with the [previously recited] tangible copy of the document a visible representation of the authentication key” to clarify that the authentication key is not necessarily contained in that tangible copy of the document. As the proposed amendment to Claim 2 is in accord with pending and originally-filed dependent Claim 16, it is respectfully submitted that Claim 2 as amended and presented herein does not add new matter, and entry thereof is respectfully requested.

Independent method Claim 7 newly recites the step of “using the receiver-generated authentication key to verify the authenticity of the initial received digital file relative to the electronic document file”, a recitation which in substance was previously included in Claim 8, which depended and continues to depend directly from independent Claim 7. Claim 8 as amended and presented herein omits the substance now included in independent Claim 7, and sets forth with improved clarity method steps included in the step of using the receiver-generated authentication presented in independent Claim 7 as amended and presented herein.

These amendments to Claims 7 and 8 do not add new matter, and entry thereof is respectfully requested.

In Claims 7, 8, 19 and 21, as amended and presented herein, the modifiers “user-generated” and “receiver-generated” have been adopted and employed with consistency to distinguish between the two types of authentication keys previously recited. These amendments clarify the recited combinations and do not add new matter. Entry thereof is accordingly respectfully requested.

The Applicants respectfully submit that the balance of the claim amendments effected herein improve clarity of comprehension and ease of recitation. It is respectfully submitted that this balance of the claim amendments need not be specifically described; as each is capable of detection and evaluation by reference to the text of the pending claims previously presented. None of these claim amendments add new matter, and entry thereof is respectfully requested.

In summary, Claims 1-25 were originally presented, and Claims 1-25 remain in the application. Claims 1, 2, 7, 8, 14, 18, 19-21, 23, and 25 have been amended herein. No claims have been canceled, and no claims have been added.

## **Background**

### **The Claimed Subject Matter**

In the technology disclosed and claimed in the present application, a sender or publisher of a document and a receiver or receivers of that document independently generate an authentication key for the document using respective electronic apparatus of each, such as the printers of each. Only if the document has not been altered in transmission will the sender-generated and the receiver-generated authentication keys match.

The authentication key generated, for example, by the printer of the sender and the printer of the receiver, is based solely on the printable content in the document. Specifically, the authentication key is derived from the placement and the size of the different colored ink drops used to print the document. The placement and the size of the ink drops that is generated by the

halftoning algorithms in a printer constitute a multi-plane bitmap that can be mathematically combined into a single number key that is unique to the document.

Advantageously, the ink drop patterns generated by the halftoning algorithm for a given source document are not readily reverse engineered from printed pages themselves, as the patterns generated for a given element in the document, such as even a single pixel, are dependent on other elements in the document. In addition, with respect to printers, halftoning algorithms resident therein are embedded in the electronics of the device and cannot readily be hacked. These attributes make it prohibitively unrealistic to intercept and modify a document in transit, or even for a document to incur inadvertent corruption, without changing the authentication key that the documents will evoke when printed by the intended recipient.

### **Overview of The Pending Rejections**

The previously pending claims were rejected variously, as will be described in detail subsequently, as being either anticipated or as being obvious in light of the following references taken singly or in several distinct combinations: United States Patent No. 6,804,373 to Tresser et al. (hereinafter “the Tresser Patent”); Unites States Patent Application Publication No. US 2004/0181671 to Brundage et al. (hereinafter “the Brundage Publication”); and United States Patent No. 5,598,473 to Linsker et al. (hereinafter “the Linsker Patent”).

Each of the cited references listed above pertains in its own way to verifying the authenticity of documentary materials and to prevention of forgeries. That alone, however, does not mean that any of the cited references listed above address technology that is closely analogous, or even analogous at all, to the technology recited in the pending claims as presented previously or as amended and presented herein. None of the cited references listed above is directed to technology that proves the authenticity of documents using an authentication key, particularly an authentication key of the type recited in the pending claims as amended and presented herein.

As a result, the long series of rejections in this prosecution suggests a substantial degree of hindsight reconstruction and strained misreadings of references, which really appear to have been inspired and guided only by the Applicants’ own disclosure.

The technology recited in the pending claims involves the generation of a unique numerical code, as an authentication key, this code being determinable from information about a document that is inherent in that document at all stages of its processing. The authentication key is not something apart from the original document that is then added to or hidden in the data of the document. The authentication key is inherent in the document to be authenticated; it exists in unity with the unmodified document itself.

By contrast, the Tresser Patent and the Brundage Publication pertain to the use of digital watermarking in authenticating documents. In such technology, a relatively invisible set of data is added to an extant document, usually in only a particular portion thereof. The original document is thus modified into a marked document, and authentication involves seeking out the location of the watermark and verifying that the watermark is authentic. The balance of the original document could be highly corrupted but remain undetected as such, provided that the detected watermark is authentic.

Similar comments apply relative to the Linsker Patent, which pertains to the use of digital signatures in authenticating documents. In such technology, a coded set of data is added to an extant document. The original document is thus modified into a signed document, and authentication involves seeking out the location of the signature, decoding the signature, and verifying that the signature is authentic. The balance of the original document could be highly corrupted but remain undetected as such, provided that the detected signature is authentic.

Rejections of the pending claims based solely on the cited references listed above are somewhat akin to anticipating an apple using various oranges. Both are forms of fruit, but the striking differences in form and in function between the two make any rejection between the two seem facially specious and unnaturally forced.

Accordingly, it is respectfully requested that any reapplication of cited references listed above be very carefully considered, that asserted parallels of structure or function between subject matter of cited references and elements of the claimed combinations be closely scrutinized, and that motivations for modifications and combinations in or among teaching in cited references be explicitly located in those references, not in the Applicant's disclosure.

## Claim Rejections - 35 U.S.C. § 102

Claims 1-11 and 14-18, which include independent Claims 1, 7, and 14, were rejected under 35 U.S.C. § 102 as being anticipated by the Tresser Patent.

In order to most succinctly explain why the claims as amended and presented herein are allowable, Applicants will direct the following remarks primarily to the rejected independent claims, understanding that once an independent claim is shown to contain patentable subject matter and, therefore, to be allowable, all claims depending directly or indirectly therefrom also contain patentable subject matter and are allowable.

### Claims 1-6

Independent method Claim 1 as amended and presented herein recites the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”.

By contrast, the Tresser Patent teaches that the image (I) undergoes a particular process before being submitted to any halftoning process. Specifically, the Tresser Patent teaches that a new image (I') is computed out of the image (I) by covering the image (I) with a grid of size H-by-V, and then averaging the grey levels on the little rectangles defined by the grid. (Tresser Patent, Column 7, lines 7-9.) Then, a halftoned version (M) of the new image (I') is computed using some preferred halftoning engine. (Tresser Patent, Column 7, lines 12-15.) Thus, according to the teachings of the Tresser Patent, a grey level averaging process is performed on the image before the halftoning process is performed.<sup>1</sup>

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<sup>1</sup> It is acknowledged that the Tresser Patent at Column 9, lines 1-2, mentions the possibility that “image I is a physical image[,] which must be scanned before the rest of the processing occurs”.

This does not, it is respectfully submitted, suggest that the physical image that must be scanned never assumes the form of the electronic image  $I(i,j)$  shown in box 311 in Figure 3. Clearly the “rest of the processing” referred to in the Tresser Patent at this location is the processing described immediately above at Column 8, line 56, through Column 9, line 1, of covering electronic image  $I(i,j)$  by a H-by-V grid and averaging gray levels over all rectangles of that grid to define a new image  $I' = \{I'(h,v)\}$  with  $1 \leq h \leq H$  and  $1 \leq v \leq V$ . That processing is a prerequisite to the halftoning subsequently performed on new image  $I' = \{I'(h,v)\}$  to move from box 312 to half-toned matrix  $M(h,v)$  shown in box 330.

The contention in the outstanding Office Action at page 3 of Paragraph 6 that the scanning of a physical image automatically creates a new image  $I' = \{I'(h,v)\}$  with  $1 \leq h \leq H$  and  $1 \leq v \leq V$ , which is then capable of without intervening transformation of being submitted directly to the halftoning process called for in diamond 320 of Figure 3 of the Tresser Patent is pure fantasy, driven by hindsight reconstruction of the Tresser Patent in light only of the specification and claims of the Applicants.

Also, according to the Tresser Patent, once the halftoned version (M) of the image is produced, it is cut into a plurality of pieces, wherein some of the pieces may be processed in an image compression engine, while others of the pieces may be processed by a digital signature scheme, such as the RSA scheme. (Tresser Patent, Column 9, lines 8-19.) Then, the information coming from part of the halftoned version (M) can be signed in a signature to be placed in the same part or a subset of that part. (Tresser Patent, Column 9, lines 26-32.) That is, the Tresser Patent teaches that the image data is split up into various pieces, and each piece is subjected to a different process such as compression or the digital signature scheme.

Thus, the Tresser Patent fails to disclose or to suggest any submission of an initial digital file “without intervening transformation directly to a predetermined halftone process” as recited in independent method Claim 1 as amended and presented herein. Correspondingly, it is respectfully submitted that independent method Claim 1 as amended and presented herein is neither anticipated nor rendered obvious by the Tresser Patent.

Accordingly, independent method Claim 1 as amended and presented herein recites patentable subject matter, and the allowance thereof is respectfully requested.

Claims 2-6 as variously amended and presented herein depend directly from independent Claim 1 and accordingly incorporate the limitations thereof. As a result it is correspondingly submitted that Claims 2-6 recite patentable subject matter and are in condition for allowance for the same reasoning as that presented above relative to independent method Claim 1 as amended and presented herein.

### **Claims 7-11**

Independent method Claim 7 as amended and presented herein recites the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”. This recitation is identical to the recitation quoted above from independent method

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There is no possible reason provided expressly or by suggestion in the Tresser Patent for such an intervening transformation to be made a standard part of the scanning that is routine to secure an electronic version of a physical image. Furthermore, if any such intervening transformation is integrated into a scanning process, electronic image I(i,j) shown in box 311 in Figure 3 must invariably first be developed before that transformation can occur; so that an “intervening transformation” is nonetheless being conducted on electronic image I(i,j) prior to any halftoning.

Claim 1 that formed the basis for the assertion that independent method Claim 1 as amended and presented herein is neither anticipated nor rendered obvious by the Tresser Patent.

Accordingly, it is correspondingly submitted at least for this reason that independent method Claim 7 as amended and presented herein recites patentable subject matter and is in condition for allowance for the same reasoning as that presented above relative to independent method Claim 1 as amended and presented herein.

Furthermore, independent method Claim 7 as amended and presented herein also recites both a digital halftone file that is “defined by a plurality of discrete digital values”, and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”.

By contrast, the Tresser Patent discloses the insertion of a watermark into the image that is to be authenticated. The watermark in fact constitutes an alteration of the data set defining the original image, notwithstanding that the alteration of the image is not perceptible to a human, it can be recognized by a machine, such as a computer. (Tresser Patent, Column 1, lines 9-21; Column 3, lines 5-45.) In the Tresser Patent, a digital signature scheme is employed to create the watermark. (Tresser Patent, Column 6, lines 6-7.)<sup>2</sup>

In that connection, it is taught in the Tresser Patent that, rather than using a mere 512 digits to produce the watermark, a larger, more secure number of 1,024 digits of the image data should be used to produce the watermark. (Tresser Patent, Column 6, lines 14-17.) Nonetheless, even that larger number of digits is relatively small as compared to the totality of a typical image to be authenticated, as the Tresser Patent admits that “an image contains typically

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<sup>2</sup> Applicants again observe that the Tresser Patent does not disclose employing a mathematical process that involves the entire data set. Instead, the Tresser Patent teaches that the data set is cut into a plurality of pieces and then either compressed or signed.

It has in response been asserted, erroneously it is respectfully submitted, that the Tresser Patent at Column 9, lines 8-19, discloses that the data stream is “optionally” cut into pieces, and therefore, because the cutting is optional, it can be concluded that the Tresser Patent inherently discloses employing a mathematical process that could involve the entire data set. See final Office Action of September 19, 2007, Paragraph 4, page 2.

The Applicants respond by again quoting exactly what is taught by the Tresser Patent at Column 9, lines 8-9. There it is stated that “[a]t 340, matrix M is interpreted as a data stream, and optionally (selectively) cut into a plurality of pieces (some of which overlap).” What the Tresser Patent is indicating is that the manner in which the data stream is cut is optional or selective. There is no question that the data stream is cut, but the manner in which the cutting is performed and/or the places at which the data stream is cut is selective or optional.



much more information [or data]” than is used to produce a watermark. (Tresser Patent, Column 6, line 18. Emphasis added.)

Thus, the Tresser Patent fails to disclose or to suggest any digital halftone file that is “defined by a plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file” as recited in independent method Claim 7 as amended and presented herein. Correspondingly, it is respectfully submitted that independent method Claim 7 as amended and presented herein is for this additional reason neither anticipated nor rendered obvious by the Tresser Patent.

Accordingly, independent method Claim 7 as amended and presented herein recites patentable subject matter, and the allowance thereof is respectfully requested.

Claims 8-11 as variously amended and presented herein depend directly from independent Claim 7 and accordingly incorporate the limitations thereof. As a result it is submitted that Claims 8-11 recite patentable subject matter and are in condition for allowance for the same reasons as presented above relative to independent method Claim 7.

#### **Claims 14-18**

Independent system Claim 14 as amended and presented herein recites a memory device containing a series of computer-executable steps that cause an associated processor to submit an initial digital file “without intervening transformation directly to a predetermined halftone process”. This recitation is identical to the recitation quoted above from independent method Claim 1 as amended and presented herein that formed the basis for the assertion that independent method Claim 1 as amended and presented herein is neither anticipated nor rendered obvious by the Tresser Patent.

Accordingly, it is submitted that independent system Claim 14 as amended and presented herein recites patentable subject matter and is in condition for allowance for the same reasoning as presented above relative to independent method Claim 1.

Claims 15-18 as variously amended and presented herein depend directly or indirectly from independent system Claim 14 and accordingly incorporate the limitations thereof. As a result it is correspondingly submitted that dependent Claims 15-18 recite patentable subject matter and are in condition for allowance for the same reasoning as presented above relative to independent system Claim 14.

### **Claim Rejections - 35 U.S.C. § 103**

#### **Claims 12-13**

Dependent Claims 12 and 13 were rejected under 35 U.S.C. § 103 as being rendered obvious by the Tresser Patent when taken in view of the Linsker Patent.

Claims 12 and 13 depend directly from independent method Claim 7 as amended and presented herein and accordingly incorporate the limitations thereof. As previously discussed relative to independent method Claim 7 as amended and presented herein, the Tresser Patent fails to disclose or to suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process” or a digital halftone file that is “defined by a plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”, all of which are recited in independent method Claim 7 as amended and presented herein.

These inadequacies in the Tresser Patent are not remedied by corresponding teachings in the Linsker Patent. The Linsker Patent also fails to teach or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a plurality of discrete digital values”, and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”.

Accordingly, the proposed combination of the Tresser Patent and the Linsker Patent neither discloses nor suggests the submission of an initial digital file (1) “without intervening transformation directly to a predetermined halftone process”, or (2) a digital halftone file that is “defined by a plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in

the digital halftone file” incorporated from independent method Claim 7 into dependent Claims 12 and 13

As a result it is correspondingly submitted that dependent Claims 12 and 13 recite patentable subject matter and are in condition for allowance, for the same reasons as those presented above relative to independent method Claim 7 as amended and presented herein.

Claims 19, 22, and 23, which include independent Claims 19 and 23, were rejected under 35 U.S.C. § 103 as being rendered obvious by the Tresser Patent when taken in view of the Brundage Publication.

### **Claims 19 and 22**

Independent system Claim 19 as amended and presented herein recites a memory device containing a series of computer-executable steps that cause an associated processor to submit an identified digital file “without intervening transformation directly to a predetermined halftone process”. This recitation is identical to the recitation quoted above from independent method Claim 1 that formed the basis for the assertion that independent method Claim 1 as amended and presented herein is neither anticipated nor rendered obvious by the Tresser Patent.

In addition, independent system Claim 19 as amended and presented herein recites a memory device containing a series of computer-executable steps that cause an associated processor to both, generate a digital halftone file that is “defined by a plurality of discrete digital values”, and to submit the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”. This recitation is identical to the recitation quoted above from independent method Claim 7 that formed a basis for the assertion that independent method Claim 7 as amended and presented herein is neither anticipated nor rendered obvious by the Tresser Patent.

These inadequacies in the Tresser Patent are not remedied by corresponding teachings in the Brundage Publication. The Brundage Publication also fails to disclose or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a plurality of

discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”.

Accordingly, the proposed combination of the Tresser Patent and the Brundage Publication neither discloses nor suggests the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file” as recited in independent system Claim 19 as amended and presented herein.

It is correspondingly submitted at least for these reasons that independent system Claim 19 as amended and presented herein recites patentable subject matter and is in condition for allowance for the same reasoning as that presented above relative to independent method Claims 1 and 7 as amended and presented herein.

Claim 22 depends directly from independent system Claim 19 and accordingly incorporates the limitations thereof. As a result it is correspondingly submitted that Claim 22 recites patentable subject matter and is in condition for allowance for the same reasoning as that presented above relative to independent system Claim 19 as amended and presented herein.

### **Claim 23**

Independent system Claim 23 as amended and presented herein recites a memory device containing a series of computer-executable steps that cause an associated processor to submit an identified digital file “without intervening transformation directly to a predetermined halftone process”. This recitation is identical to the recitation quoted above from independent method Claim 1 that formed the basis for the assertion that independent method Claim 1 as amended and presented herein is neither anticipated nor rendered obvious by the Tresser Patent.

Neither is this inadequacy in the Tresser Patent remedied by corresponding teachings in the Brundage Publication. The Brundage Publication also fails to disclose or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”.

Accordingly, the proposed combination of the Tresser Patent and the Brundage Publication neither discloses nor suggests the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process” as recited in independent system Claim 19.

It is correspondingly submitted that independent system Claim 19 as amended and presented herein recites patentable subject matter and is in condition for allowance for the same reasoning as that presented above relative to independent method Claim 1.

### **Claims 20 and 21**

Dependent Claims 20, 21, 24, and 25 were rejected under 35 U.S.C. § 103 as being rendered obvious by the Tresser Patent when taken in view of the Linsker Patent and the Brundage Publication.

Claims 20 and 21 depend directly from independent system Claim 19 as amended and presented herein and accordingly incorporate the limitations thereof.

As previously discussed relative to independent method Claim 19 as amended and presented herein, the Tresser Patent fails to disclose or to suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process” or a digital halftone file that is “defined by a plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”, all of which are recited in independent system Claim 19.

These inadequacies in the Tresser Patent are not remedied by corresponding teachings in the Linsker Patent. The Linsker Patent also fails to disclose or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a plurality of discrete digital values”, and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”.

Thus, the proposed combination of the Tresser Patent and the Linsker Patent neither teaches nor suggests the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a

plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”, recitations incorporated from independent system Claim 19 into dependent Claims 20 and 21.

Neither are these inadequacies in the combination of the Tresser Patent and the Linsker Patent remedied by corresponding teachings in the Brundage Publication. The Brundage Publication also fails to disclose or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a plurality of discrete digital values”, and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”.

Accordingly, the proposed combination of the Tresser Patent, the Linsker Patent, and the Brundage Publication neither discloses nor suggests the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, or a digital halftone file that is “defined by a plurality of discrete digital values” and the submission of the digital halftone file to a mathematical process of the type “involving each of the plurality of discrete digital values in the digital halftone file”, recitations incorporated from independent system Claim 19 into dependent Claims 20 and 21.

As a result it is correspondingly submitted that dependent Claims 20 and 21 recite patentable subject matter and are in condition for allowance, basically for both of the same reasons as those presented above relative to independent method Claim 19 as amended and presented herein.

#### **Claims 24 and 25**

Claims 24 and 25 depend directly from independent system Claim 23 as amended and presented herein and accordingly incorporate the limitations thereof.

Nonetheless, as previously discussed relative to independent system Claim 23 as amended and presented herein, the Tresser Patent fails to disclose or to suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”. These inadequacies in the Tresser Patent are not remedied by corresponding teachings

in the Linsker Patent. The Linsker Patent also fails to disclose or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”.

Thus the proposed combination of the Tresser Patent and the Linsker Patent neither disclose nor suggest submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, recitations incorporated from independent system Claim 23 into dependent Claims 24 and 25.

Neither are these inadequacies in the combination of the Tresser Patent and the Linsker Patent remedied by corresponding teachings in the Brundage Publication. The Brundage Publication also fails to disclose or suggest the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”.

Accordingly, the proposed combination of the Tresser Patent, the Linsker Patent, and the Brundage Publication neither discloses nor suggests the submission of an initial digital file “without intervening transformation directly to a predetermined halftone process”, recitations incorporated from independent system Claim 23 into dependent Claims 24 and 25.

As a result it is correspondingly submitted that dependent Claims 24 and 25 recite patentable subject matter and are in condition for allowance, for the same reasons as those presented above relative to independent system Claim 23 as amended and presented herein.

## **CONCLUSION**

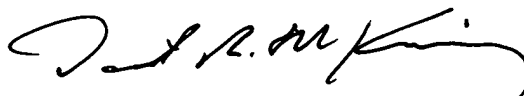
In light of the above, Applicant respectfully submits that pending Claims 1-25 as amended and presented herein are now in condition for allowance. Therefore, Applicants request that all outstanding rejections be withdrawn, and that Claims 1-25 as amended and presented herein be allowed and passed to issue.

If any impediment to the allowance of Claims 1-25 as amended and presented herein remains after entry of this Amendment, the Examiner is strongly encouraged to call David R. McKinney at (801) 748-1450 so that such matters may be resolved as expeditiously as possible.

No claims were added herein, and no claims were canceled. Therefore, no additional fee is due. Please charge \$120.00 to Deposit Account No. 08-2025 pursuant to 37 C.F.R. § 1.17(a)(1), for a 1 month extension of time pursuant to 37 C.F.R. § 1.136.

DATED this 9<sup>th</sup> day of May, 2008.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "D. R. McKinney", with a stylized flourish at the end.

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